

Exhibit 3

From: Gadeir Abbas
To: [Konkoly, Antonia \(CIV\)](#); [Powell, Amy \(CIV\)](#)
Subject: RE: meet and confer request re all RFP's
Date: Monday, January 08, 2018 2:24:55 PM
Attachments: [image001.png](#)

Toni,

Great. Let's talk at 5 EST. It'll be just be me.

I think we can discuss the global issues:

1. Redacted docs; summaries of entirely privileged docs
2. Plaintiffs' counsel getting SSI clearances
3. Producing all the documents – whether the government will do that or not

You can reach me on my cell, or if you'd like me to call, just let me know what number. I'm happy to schedule a time to meet and confer each day this week so that we can be sure to do all the narrowing that we can.

Regards,

Regards,

Gadeir Abbas, Esq.
Senior Litigation Attorney

logo-1359288842



453 New Jersey Ave, SE
Washington, DC 20003
Tel: 202.742.6420 Fax: 202.488.0833
Dir: 202.640.4935 Cell: 720.251.0425

www.cair.com

Licensed to practice in VA, not in DC.
Practice limited to federal matters.

[This email may contain confidential and privileged material for the sole use of the intended recipient(s). Any review, use, distribution or disclosure by others is strictly prohibited. If you are not the intended recipient (or authorized to receive for the recipient), please contact the sender by reply email and delete all copies of this message.]

[WEB](#) | [FACEBOOK](#) | [TWITTER](#)

From: Konkoly, Antonia (CIV) [mailto:Antonia.Konkoly@usdoj.gov]

Sent: Monday, January 8, 2018 1:03 PM

To: Gadeir Abbas <gAbbas@cair.com>; Powell, Amy (CIV) <Amy.Powell@usdoj.gov>

Subject: RE: meet and confer request re all RFP's

Gadeir,

I'm about to leave for a meeting but should be back by 4 or 4:30. Amy and I are available to confer after that time, into the early evening.

We are happy to discuss the RFPs further but take the position that a blanket request for "all responsive documents" a few days before you intend to file is neither reasonable nor sufficient to meet your meet and confer obligations.

Toni

From: Gadeir Abbas [<mailto:gAbbas@cair.com>]

Sent: Monday, January 08, 2018 12:09 PM

To: Powell, Amy (CIV) <apowell@CIV.USDOJ.GOV>; Roth, Dena M. (CIV) <droth@CIV.USDOJ.GOV>; Konkoly, Antonia (CIV) <ankonkol@CIV.USDOJ.GOV>; Wetzler, Lauren (USAVAE) <Lauren.Wetzler@usdoj.gov>

Subject: meet and confer request re all RFP's

Amy, Dena, and Toni,

I mentioned this to you last week that we plan to file a motion to compel regarding your document production. The motion will seek the production—either in its entirety, a redacted version, or a summary of the document—of all responsive documents.

I'd like to schedule a meet and confer. I'm available today, tomorrow at 930 AM EST for an hour, and all day Wednesday. Because of the complexity of the motion, any issues that we can't resolve by 11 AM EST on Thursday will have to be addressed in the motion.

We're filing this Motion to Compel before Friday's hearing and are open to your thoughts on scheduling briefing and hearing on it. Because we'll be seeking all responsive documents, you'll—I'm sure—be asserting the state secrets privilege.

Regards,

Gadeir Abbas, Esq.
Senior Litigation Attorney

logo-1359288842



453 New Jersey Ave, SE
Washington, DC 20003
Tel: 202.742.6420 Fax: 202.488.0833
Dir: 202.640.4935 Cell: 720.251.0425

www.cair.com

Licensed to practice in VA, not in DC.
Practice limited to federal matters.

[This email may contain confidential and privileged material for the sole use of the intended recipient(s). Any review, use, distribution or disclosure by others is strictly prohibited. If you are not the intended recipient (or authorized to receive for the recipient), please contact the sender by reply email and delete all copies of this message.]

[WEB](#) | [FACEBOOK](#) | [TWITTER](#)